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Attorneys for Plaintiffs
Tikisha Upshaw, Tyreka Stewart and
Andrea Hernandez

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO/OAKLAND DIVISION

TIKISHA UPSHAW, TYREKA STEWART and
ANDREA HERNANDEZ, on behalf of
themselves and others similarly situated,

Plaintiffs,

vs.

ALAMEDA COUNTY; ALAMEDA COUNTY
SHERIFF'S OFFICE; SHERIFF GREGORY
J. AHERN; ASSISTANT SHERIFF D.
HOUGHTELLING, COMMANDER TOM
MADIGAN; CAPTAIN D. HESSELEIN,
CAPTAIN TARA RUSSELL, CAPTAIN D.
SKOLDKVIST, DEPUTY STINSON, DEPUTY
SENSIBA, DEPUTY SARTIN, DEPUTY
KRANTAVILLE, DEPUTY HENDERSON,
DEPUTY GUERRA, DEPUTY CRANDALL,
DEPUTY CHANDRA AND DOES 1 THRU 50.

Defendants.

Case No. 3:18-cv-07814-JD

**PLAINTIFFS NOTICE OF MOTION
FOR A LIMITED ISSUE CLASS
CERTIFICATION**

Date: August 1, 2019

Time: 10 a.m.

Dept: 11

Hon. James Donato, presiding

1 TO ALL PARTIES AND THEIR COUNSELS OF RECORD:

2 PLEASE TAKE NOTICE that plaintiffs **TIKISHA UPSHAW, TYREKA STEWART**
3 **AND ANDREA HERNANDEZ**, hereby move the court for a limited issue class certification. This
4 motion will be heard on August 1, 2019, at 10 a.m., in Courtroom 11, United States Federal
5 District Court, 450 Golden Gate Avenue, San Francisco, California.

6 This motion is made pursuant to Federal Rules of Civil Procedure 23(c)(4) which permits a
7 limited issue class certification; and on the grounds that this motion meets all of the criteria named
8 in F.R.C.P. Rule 23(a) and (b)(2), and that a limited issue class certification is in the interests of
9 judicial economy.

10 Plaintiffs will ask the court to grant an order certifying the class of all women who are now
11 or will be in the future, incarcerated in the Alameda County Jails; on the limited issue of whether
12 Defendants' policies and practices depriving and disrupting women prisoners' sleep violates
13 plaintiffs' and class members' constitutional rights; and for an order appointing Tikisha Upshaw,
14 who is currently in custody and pretrial, as the class representative.

15 This motion is based on this notice, the accompanying memorandum of points and
16 authorities, the declarations of Dr. Jamie Zeitzer, of plaintiff Tikisha Upshaw, and of Dennis
17 Cunningham, and any further argument which may be permitted by the court.

18 Respectfully submitted,

19 Dated: June 27, 2019

LAW OFFICE OF YOLANDA HUANG

20 By: /s/ Yolanda Huang

21 YOLANDA HUANG

22 DENNIS CUNNINGHAM

23 By: /s/ Dennis Cunningham

24 DENNIS CUNNINGHAM

25 ATTORNEYS FOR PLAINTIFFS
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